



# State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

LISA P. JACKSON  
Acting Commissioner

JON S. CORZINE  
Governor

March 20, 2006

Mr. Albert Boettler, Sr. Consulting Associate  
DuPont Chambers Works  
Deepwater, NJ 08023

Re: DuPont Chambers Works Facility  
PFOA – Suite of Perfluorinated Chemicals at Chambers Works Facility  
Pennsville Township, Salem County

Dear Mr. Boettler:

The New Jersey Department of Environmental Protection (NJDEP) received the attached letter from the Delaware Riverkeeper that is requesting a minor modification to the NJPDES-DGW permit. The NJDEP is currently working on a response to this letter and anticipates making the requested change. The NJDEP noticed that the laboratory analysis attached to this letter reported a whole suite of perfluorinated chemicals in addition to PFOA. There is a considerable amount of information on PFOS; however, the NJDEP would like to know if DuPont has any information on toxicity and human blood levels of these other perfluorinated chemicals.

If you have any questions, please contact me at (609) 984-4071 ([frank.faranca@dep.state.nj.us](mailto:frank.faranca@dep.state.nj.us)).

Sincerely,

Frank Faranca, CHMM, Site Manager  
Bureau of Federal Case Management

Attachment

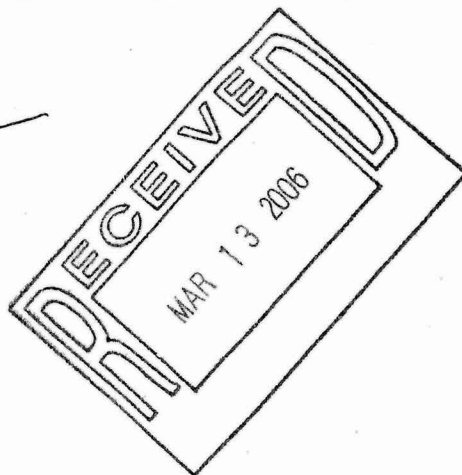
C: David Doyle, DRMR/BEERA  
Anne Pavelka, DRMR/BGWPA  
Andrew Park, USEPA, REGION II  
Gloria Post, DSRT



An American Littoral Society Affiliate

March 6, 2006

*Lawrence*



Lisa Jackson  
Office of the Commissioner  
NJ Department of Environmental Protection  
401 E. State Street  
P.O. Box 402  
Trenton, New Jersey 08625

Dear Commissioner Jackson,

Delaware Riverkeeper Network (DRN) is concerned about the presence, use and discharge of perfluorooctanoic acid (PFOA) and related chemicals (for the rest of this letter referred to collectively as PFOA) at Dupont's Chambers Works facility in Deepwater and Carneys Point. In researching the issue, we were unable to find any source of data for water sampling for these chemicals in the region around the facility. DRN conducted a random sampling of tap water in the communities closest to Dupont's plant in an effort to gather information.

Enclosed are the results of testing of the well samples we collected on November 27, 2005. Delaware Riverkeeper Network analyzed tap water from several homes for the presence of PFOA. After receiving the results in early 2006, we met with the two water companies that service the 3 towns involved and shared with them a blind copy of the results. As a result, the water companies are taking independent action to conduct testing of their supply wells and water systems. In addition, we have transmitted our test results to each involved homeowner on March 3, 2006.

While the level of PFOA found in the samples was not "high" as defined by a recent court decision, our test results do show the presence of the chemical in the groundwater that serves these residents. Considering the serious health impacts of this family of chemicals and the EPA initiative to control the pollutant, we consider it very important to monitor for it in the groundwater in the region. Since Dupont has used, handled, stored, and/or manufactured PFOA at its facilities in Pennsville and Carneys Point, Dupont should be responsible for such testing.

We have spoken with DEP's Site Remediation program and informed them of our concerns and that we conducted testing. We promised to send the results after the water companies and residents were fully informed.

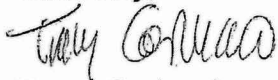
DELAWARE RIVERKEEPER NETWORK  
P.O. Box 326  
Washington Crossing, PA 18977  
tel: (215) 369-1188  
fax: (215) 369-1181  
drkn@delawareriverkeeper.org  
www.delawareriverkeeper.org

We are aware the DEP is requiring testing for PFOA in Dupont's recently renewed NJPDES permit for its surface water discharge. However, there was no modification made to Dupont's NJPDES/DGW permit requiring testing for PFOA.

We request that a modification be made to NJ0083429 and any other Dupont permit that requires groundwater monitoring to require regular and ongoing sampling for PFOA of all of Dupont's groundwater monitoring wells. This sampling should not be phased in or partially applied; the sampling should be required immediately for all of Dupont's groundwater monitoring wells on the same schedules as all other parameters. The sampling should be officially required through a permit modification. We have also suggested to the water companies that Dupont should pay for regular and ongoing testing of their water supply wells and would appreciate DEP support for this position.

Thank you for your consideration. We will await your response.

Sincerely,



Tracy Carluccio  
Director, Special Projects

CC: Sam Wolfe, Environmental Regulation  
Frank Faranca, CHMM

Attachment

CLIENT ID	Field Blank							Lab Blank	Spiked Matrix
AXYS ID	L8456-1 (A)							WG17749-101	WG17749-102
WORKGROUP	WG17749							WG17749	WG17749
Sample Size	0.501 L	0.500 L	0.501 L	0.503 L	0.504 L	0.500 L	0.503 L	0.500 L	
UNITS	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L	% Recov
PFBA	< 1.09	4.78	1.75	1.46	8.15	6.64	8.04	< 1.09	99.8
PFPeA	< 1.03	13.7	9.33	8.16	46.4	38.8	38.6	< 1.03	92.8
PFHxA	< 1.01	21.8	15	17.1	89.2	84.6	72.2	< 1.01	102
PFHpA	< 1.01	9.07	5.09	6.9	42.4	37.1	29.2	< 1.01	88.9
PFOA	< 1.08	9.38	5.84	5.31	64.8	63	44.8	< 1.08	105
PFNA	< 1.04	< 1.04	< 1.04	< 1.04	13.8	13.3	6.44	< 1.04	110
PFDA	< 1.03	< 1.04	< 1.03	< 1.03	5.57	7.02	2.62	< 1.03	105
PFUnA	< 1.05	< 1.05	< 1.05	< 1.04	< 1.04	< 1.05	< 1.04	< 1.05	96
PFDoA	< 1.06	< 1.06	< 1.06	< 1.05	< 1.05	< 1.06	< 1.05	< 1.06	85.9
PFBS	< 1.99	< 1.99	< 1.99	< 1.98	< 1.98	< 1.99	< 1.98	< 1.99	100
PFHxS	< 2.03	< 2.04	< 2.03	< 2.03	2.16	2.67	< 2.02	< 2.03	103
PFOS	< 1.98	< 1.98	< 1.98	< 1.97	5.39	3.11	7.75	< 2.83	104
PFOSA	< 0.999	< 1.00	< 0.998	< 0.995	< 0.993	< 1.00	< 0.994	< 0.998	92.2

See below for definitions of possible flags and labels in the database (sheet tab 'GenericEDD')

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less than the detection limit  
number following this symbol represents the detection limit